

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:) Chapter 11
)
CIRCUIT CITY STORES, INC., et al.,) Case No. **08-35653**
)
Debtors.) Jointly Administered

MOTION FOR ADMISSION PRO HAC VICE
(CYNTHIA E. RODGERS-WAIRE)

Troy Savenko ("Movant") hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Cynthia E. Rodgers-Waire, an attorney and partner with the law firm of Wright, Constable & Skeen, L.L.P., to appear pro hac vice in the above-captioned bankruptcy case before the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Case") to represent Safeco Insurance Company of America ("Safeco"), and in support of this Motion, the Movant states as follows:

1. Ms. Rodgers-Waire is a partner with the law firm of Wright, Constable & Skeen, L.L.P. and a member in good standing of the Bar of Maryland and the Bar of the District of Columbia. She is admitted to practice before the United States District Court for the District of Maryland, the United States Bankruptcy Court for the District of Maryland, the United States District Court for the District of Columbia, the United States Court of Appeals for the Fourth Circuits, and the United States Court of Federal Claims. There are no disciplinary proceedings pending against Ms. Rodgers-Waire in any jurisdiction in which she is admitted to practice.

Troy Savenko (Va. Bar No. 44516)
Leslie A. Skiba (Va. Bar No. 48783)
GREGORY KAPLAN, PLC
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2. Movant requests that this Court authorize Ms. Rodgers-Waire to appear and be heard at hearings and otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of Safeco.

3. Movant and his law firm shall serve as co-counsel with Ms. Rodgers-Waire for her participation in the Bankruptcy Case (and related proceedings) on behalf of Safeco.

4. Notice of this Motion will be provided electronically to (a) the Office of the United Trustee, (b) to counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Cynthia E. Rodgers-Waire to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit A attached hereto and grant such other and further relief as is just.

Dated: October 28, 2009

Respectfully submitted,

/s/ Troy Savenko

Troy Savenko (Va. Bar No. 44516)
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Counsel to Safeco Insurance Company of America

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2009, a copy of the foregoing was filed and served via the Court's Electronic Case Filing System on all parties receiving such notice, including the following: (a) counsel for the Debtor; (b) the United States Trustee; (c) counsel for the Official Committee of Unsecured Creditors; and (d) all parties that have requested notice of papers with the Court's CM/ECF Noticing System pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

/s/ Troy Savenko
Movant

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:) Chapter 11
)
CIRCUIT CITY STORES, INC., et al.,) Case No. **08-35653**
)
Debtors.) Jointly Administered

ORDER GRANTING ADMISSION PRO HAC VICE
(CYNTHIA E. RODGERS-WAIRE)

This matter came before the Court upon the Motion for Admission Pro Hac Vice of Cynthia E. Rodgers-Waire (the "Motion") filed by Troy Savenko, seeking admission pro hac vice for Cynthia E. Rodgers-Waire, of the law firm Wright, Constable & Skeen, L.L.P., in the above-styled bankruptcy case (the "Bankruptcy Case") pursuant to local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Cynthia E. Rodgers-Waire be authorized to practice pro hac vice before the Court in this Bankruptcy Case, it is hereby

ORDERED as follows:

1. The Motion is granted.
2. Cynthia E. Rodgers-Waire, of the law firm of Wright, Constable & Skeen, L.L.P.,

is hereby admitted to appear and participate in this Bankruptcy Case and any related proceedings

Troy Savenko (Va. Bar No. 44516)
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pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of Safeco Insurance Company of America,

ENTERED:

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

Troy Savenko (Va. Bar No. 44516)
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Counsel to Safeco Insurance Company of America

Rule 90221-1 Certification

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties simultaneously with the filing of the Motion.

Counsel

SERVICE LIST

Jeffrey N. Pomerantz Pachulski Stang Ziehl & Jones LLP 10100 Santa Monica Blvd., Suite 1100 Los Angeles, CA 90067 jpomerantz@pszjlaw.com <i>Counsel to the Official Committee of Unsecured Creditors</i>	Dion W. Hayes McGuireWoods LLP One James Center, 901 E. Cary St. Richmond, VA 23219 circuitcityservice@mcguirewoods.com <i>Counsel to Debtors</i>
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Robert B. Van Arsdale Office of the United States Trustee 701 East Broad Street, Suite 4304 Richmond, VA 23219 Robert.B.Van.Arsdale@usdoj.gov <i>Assistant United States Trustee</i>	Cynthia E. Rodgers-Waire Wright, Constable & Skeen, L.L.P. One Charles Center, 16 th Floor 100 North Charles Street Baltimore, MD 21201-3812 mstover@wcslaw.com <i>Counsel to Safeco Insurance Company of America</i>